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BY ECF FILING

Hon. Debra Freeman
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 10007-1312

**Re: Dhaliwal v. HYPR Corp. and
George Avetisov, 17 Civ. 7959 (GBD) (DCF)**

Dear Magistrate Judge Freeman:

We represent plaintiff Amarpreet Dhaliwal in the above-referenced matter. We submit this Joint Status Report along with counsel for defendants HYPR Corp. and George Avetisov, pursuant to the Scheduling Order entered by the Court on December 21, 2018 (ECF No. 52).

The fact discovery cut-off date was January 31, 2019. The parties have some lingering discovery disputes that they are attempting to resolve; otherwise the parties will bring them to Your Honor in short order. The parties are proceeding with potential expert designations, potential rebuttal expert designations, and, if necessary, expert discovery. The expert discovery cut-off is April 19, 2019. Both parties are contemplating summary judgment motions and will be discussing a briefing schedule to propose to the Court.

With regard to mediation, the parties have not reached an agreement on whether to participate in mediation at this time.

Respectfully submitted,

/s/ Gerry Silver

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cc: Jonathan Bach, Esq.